THE STATE of ALASKA
GOVERNOR BILL WALKER

Department of Environmental Conservation

DIVISION OF SPILL PREVENTION AND RESPONSE
Contaminated sites Program

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ADEC File: 2319.26.002

Certified Mail – Return Receipt Requested

June 29, 2016

Joanne Browning
Kasilof Riverview Lodge
P.O. Box 254
Kasilof, Alaska 99610

Re: Kasilof Riverview Lodge
ADEC Hazard ID #384
Contaminated Soil Stockpile - Reporting Requirement
Corrective Action Plan Required

Dear Ms. Browning:

We periodically review the status of open contaminated sites in our records, in an effort to bring these sites to closure. The Kasilof Riverview Lodge site remains open in our records and in the Alaska Department of Environmental Conservation's (ADEC) Contaminated Sites Program database.

On November 6, 2014, we issued a letter to you requesting that any reports you may have documenting the completion of the work entailed in the ADEC approved June 3, 2005 Monitoring Well Sampling, Groundwater Flow, and Stockpile Remediation Plan be provided to our office. A copy of ADEC's November 6th letter is attached, for your information and use. Our letter also identified the remaining corrective action work requirements that would need to be completed before ADEC could consider issuance of a closure decision for your site, as follows:

> *"The two remaining requirements that must be accomplished before ADEC could consider issuance of a closure decision for your site are groundwater sampling and analysis in order to identify petroleum concentrations in groundwater, and the proper treatment/disposal of the approximately 200 cubic yards of contaminated soils that are stockpiled on site. After groundwater quality monitoring is considered complete, the groundwater monitoring wells will also need to be properly decommissioned."*

We find no further correspondence or communication from you in our records since June 13, 2005.

On Memorial Day weekend, 2016, we observed that the contaminated soil stockpile was no longer present at its original location on your property. Alaska law [18 AAC 78.274(b)] requires that an

owner or operator of an underground storage tank (UST) system obtain ADEC approval before moving or disposing of contaminated soil subject to Alaska's Underground Storage Tanks regulations. ADEC approval was never issued, yet the contaminated soil stockpile has been moved.

At this time we are requiring that you provide our office with a written response *by no later than July 14, 2016*, explaining when the soils from the former contaminated soil stockpile were moved, how the soils were moved, who was directly involved in the physical movement of the soils, where the soils were moved to, and the current location of the soils.

Addtionally, we are also requiring that you hire a qualified environmental professional to prepare and provide a corrective action plan, under the authority provided in 18 AAC 78.250 (Corrective action plan). This corrective action plan must be signed by a qualified environmental professional, and be provided to our office *by no later than July 28, 2016*. The corrective action plan must include the following corrective action work elements:

1) A sampling and analysis plan to assess the former location of the contaminated soil stockpile location for residual petroleum contamination;
2) A sampling and analysis plan to assess the petroleum contaminant concentrations in the soils from the former soil stockpile location, wherever those soils currently reside;
3) Inspection and location of the remaining groundwater monitoring wells;
4) A sampling and analysis plan to re-sample the remaining groundwater monitoring wells; and
5) Prepare and provide our office with a final report covering the completion of these work tasks.

If you have any questions about the requirements being imposed at this time, or desire further assistance or direction, you may contact me at (907) 262-3422, or via e-mail at paul.horwath@alaska.gov

Sincerely,

Paul Horwath

Paul Horwath
Engineer I, DEC

Attachment: ADEC's November 6, 2014 letter; Re: Current Site Status

Cc: Kara Kusche, ADEC, Anchorage